

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

vs.

PACIFICORP d.b.a. PACIFIC POWER,

Respondent.

DOCKET UE-090205

**RESPONSE TO PETITION TO
INTERVENE OF THE INDUSTRIAL
CUSTOMERS OF NORTHWEST
UTILITIES**

1 Pursuant to WAC 480-07-355(2), Pacific Power (the Company) responds to the
Petition to Intervene (Petition) of the Industrial Customers of Northwest Utilities (ICNU),
filed on February 19, 2009. While the Company does not object to ICNU's intervention
in this proceeding, it does object to ICNU's characterization of its interests in this
proceeding.

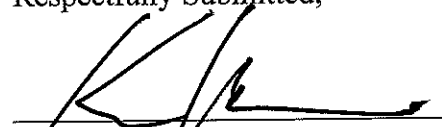
2 A petitioner may intervene in a docket if it has a substantial interest in the subject
matter or if its participation is in the public interest. WAC 480-07-355(3). ICNU alleges
that some of its members are customers of the Company and that they will be affected by
the proposed rate increase. On this basis, the Company agrees that ICNU has met the
substantial interest standard and is entitled to intervene in this case.

3 The Petition also states that ICNU has a substantial interest in this proceeding
because the proposed rate increase will result in rate shock. The Company objects to
ICNU's unsubstantiated allegation of rate shock and submits that this allegation fails to
meet the intervention standards.

Based upon the foregoing, the Company does not object to the Petition.

DATED: February 27, 2009.

Respectfully Submitted,



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